

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>	)	20-13536
	)	
<b>Mary Ann Hairston-Prah</b>	)	<b>Chapter 13</b>
	)	
<b>Debtor(s).</b>	)	<b>Judge COX</b>
	)	

**NOTICE OF MOTION**

**To the following persons or entities who were served via email by the Bankruptcy Court:**

U.S. Trustee: USTPRegion11.ES.ECF@usdoj.gov

Tom Vaughn, Ch. 13 Trustee: ecf@tvch13.net, ecfchi@gmail.com, courtmail@tvch13.net

**To the following persons or entities who were served via regular U.S. Mail:**

See attached service list.

PLEASE TAKE NOTICE that on **July 27, 2020**, at **9:00 AM**, I will appear before the **Honorable Jacqueline Cox**, or any judge sitting in that judge's place, and present the attached **Motion to Extend the Automatic Stay**.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at [www.CourtSolutions.com](http://www.CourtSolutions.com) or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

**PROOF OF SERVICE**

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, before 5:00 p.m. on July 14, 2020 with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

\_\_\_\_\_/s/ David M. Siegel  
David M. Siegel, A.R.D.C. #6207611  
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES  
790 Chaddick Drive  
Wheeling, IL 60090  
847/ 520-8100

Mary Ann Hairston-Prah  
16440 California Ave.  
Markham, IL 60428-4706

Capital One Bank USA NA  
PO Box 71083  
Charlotte, NC 28272-1083

Capital One Auto Finance, a division of Capi  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Check N Go | Bankruptcy Department  
3435 Dempster  
Skokie, IL 60076-2441

AT&T | Bankruptcy Department  
5407 Andrew Highway  
Midland, TX 79706-3615

City of Chicago Dept. of Revenue  
Camera Enforcement Violation  
PO Box 88292  
Chicago, IL 60680-1292

Advocate Medical Group  
20110 Governors Highway  
Olympia Fields, IL 60461-1088

City of Chicago Parking  
Department of Finance  
P. O. Box 6330  
Chicago, IL 60680-6330

Americash-Bankruptcy Department  
Market Square Shop Center  
180 S Bolingbrook Dr  
Bolingbrook, IL 60440-2852

City of Markham  
16313 S. Kedzie Parkway  
Harvey, IL 60428-5598

Aprial Healthcare, LLC  
Attn: Legal Department  
26220 Enterprise Court  
Lake Forest, CA 92630-8405

Codilis & Associates  
15W030 N. Frontage Rd. | Suite 100  
Burr Ridge, IL 60527-6921

Arnold Scott Harris, P.C.  
111 W. Jackson Blvd. Ste. 600  
Chicago, IL 60604-3517

Debt Stoppers/Semrad  
20 S. Clark Street | 28th Floor  
Chicago, IL 60603-1811

Cap One | Bankruptcy Department  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

First Premier Bank  
3820 N Louise Ave  
Sioux Falls, SD 57107-0145

Capital One Auto Finance  
| a division of Capital One NA  
4515 N Santa Fe Ave Dept APS  
Oklahoma City, OK 73118-7901

GLOBAL PAYMENTS CHECK SERVICES LLC  
ATTN F&B SUPPORT  
6215 W HOWARD STREET  
NILES IL 60714-3403

Capital One Auto Finance, a division of  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Heighs Finance  
Bankruptcy Department  
1815 W 45th St.  
Griffith, IN 46319-3702

IC Systems  
444 Highway 96 East  
Saint Paul, MN 55127-2557

IRS | Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

ILLINOIS DEPARTMENT OF REVENUE  
BANKRUPTCY UNIT  
PO BOX 19035  
SPRINGFIELD IL 62794-9035

JPMCB Auto Finance  
Bankruptcy Department  
PO Box 901076  
Fort Worth, TX 76101-2076

JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

Metro South Hospital  
12246 S. Pulaski Road  
Alsip, IL 60803-1405

Midwest Orthopaedic at Roselle  
PO Box 88336  
Carol Stream, IL 60188-0336

Ocwen Loan Service, LLC  
Attn: Bankruptcy Department  
PO Box 24605  
West Palm Beach, FL 33416-4605

PHH Mortgage Corporation  
Bankruptcy Department  
1 Mortgage Way, Mail Stop SV22  
Mount Laurel, NJ 08054-4637

PRA Receivable Management  
PO Box 41021  
Norfolk, VA 23541-1021

Pollack & Rosen, PC  
1825 Barrett Lakes Blvd|Suite 510  
Kennesaw, GA 30144-7519

Real Time Resolutions, Inc.  
Bankruptcy Department  
PO Box 566027  
Dallas, TX 75356-6027

SYNCB/WALMART DC  
4125 Woodward Plaza  
Alpharetta, GA 30005-8738

Secretary of State  
Safety & Financial Responsibility  
2701 South Dirksen Parkway  
Springfield, IL 62723-1000

Secreary of State License Renewal\*  
17 N State|Suite 1100  
Chicago, IL 60602-3561

Sun Cash  
598 Torrence Ave  
Calumet City, IL 60409-3813

Synchrony Bank (Walmart Credit Card)  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

TBOM/ATLS/FORTIVA  
PO Box 105555  
Atlanta, GA 30348-5555

THD/CBNA (Home Depot)  
PO Box 6497  
Sioux Falls, SD 57117-6497

The Bank of Missouri  
P.O. Box 105555  
Atlanta, GA 30348-5555

U.S. Department of Housing and Urban Develop  
77 West Jackson Boulevard  
Chicago, IL 60604-3579

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>	)	<b>20 B 13536</b>
	)	
<b>Mary Ann Hairston-Prah,</b>	)	<b>Chapter 13</b>
	)	
<b>Debtor(s).</b>	)	<b>Judge Cox</b>

**MOTION TO EXTEND THE AUTOMATIC STAY**

NOW COMES the Debtor, by and through her attorneys, DAVID M. SIEGEL & ASSOCIATES, and in support of her Motion, states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. On January 30, 2020 the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, and the hearing on confirmation is set for August 24, 2020.
3. Tom Vaughn was appointed Trustee in this case.
4. That Debtor had a prior pending bankruptcy (Case#18-22183) within one year preceding the filing of this case that was dismissed other than under §707(b).
5. That Debtor has filed the present case in good faith and there has been a change in circumstances since the previous case.
6. That Debtor's financial affairs have substantially changed because the Debtor lost her part time job which caused her to fall behind in her plan payments.
7. That Debtor is now getting family help to replace the lost income which will help her with her Chapter 13 plan payments which is evidenced by a signed Affidavit (See Attached Exhibit A).
8. That Debtor requests pursuant to §362(c)(3) that the automatic stay be extended as to any and all creditors.

9. That this request to extend the automatic stay is made in good faith, without the intent to defraud creditors, and proper notice has been had on all necessary parties.

10. That the Debtor has filed an additional two individual bankruptcy cases, which include: 15-30430, filed 09/04/15, discharged 12/22/15; 18-22183, filed 8/7/18, dismissed 1/30/20.

WHEREFORE, Debtor respectfully requests that this honorable court grant Debtor's Motion to Extend the Automatic Stay.

Respectfully Submitted,

/s/ David M. Siegel  
David M. Siegel, A.R.D.C. #6207611  
Attorney for Debtor(s)

DAVID M. SIEGEL & ASSOCIATES  
790 Chaddick Drive  
Wheeling, IL 60090  
(847) 520-8100

# EXHIBIT

# A

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re: ) Case No: 20-13536  
 )  
Mary Ann Hairston-Prah ) Chapter 13  
 )  
Debtor(s). ) Judge: COX

**AFFIDAVIT**

The Debtor, **Mary Ann Hairston-Prah**, in the above captioned case, under penalty of perjury, states as follows:

1. That I, Mary Ann Hairston-Prah, is the debtor in the above-referenced case, and have knowledge of the facts contained within this affidavit.
2. That I filed a previous Chapter 13 cases, Case #18-22183, dismissed on January 30, 2020.
3. That the aforementioned case was dismissed because I lost my part time job which caused me to fall behind in my plan payments.
4. I am now getting family help to replace the lost income which will help me with my Chapter 13 plan payments.
5. That said income will allow the Chapter 13 plan to be completed within 60 months, and will allow the effective reorganization of our debts.
6. That this current Chapter 13 case was filed in good faith, with the intention of repaying my creditors.

By signing this statement, we declare under penalty of perjury that all of the information contained herein is true and accurate, and acknowledge that the Court may rely on the truth of this statement in determining whether to impose the bankruptcy stay for the above Chapter 13 case. I understand the Court may revoke confirmation of the Chapter 13 Plan if the statements relied upon are not accurate.

Signed: Mary Ann Hairston-Prah  
Mary Ann Hairston-Prah

Date: 3-13-2020

Prepared By:  
DAVID M. SIEGEL & ASSOCIATES  
790 Chaddick Drive  
Wheeling, IL 60090  
847/ 520-8100

SUBSCRIBED AND SWORN to  
before me this 13 day of  
March 2020.

Christine Helen Clar  
NOTARY PUBLIC

